

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

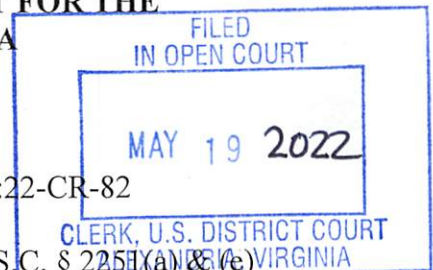
UNITED STATES OF AMERICA

v.

CHAD MICHAEL LEHOFFER

Defendant.

) Criminal No. 1:22-CR-82
)
) Count 1: 18 U.S.C. § 2251(a)(1) & (e)
) Sexual Exploitation of Children
)
) Count 2: 18 U.S.C. § 2252(a)(1) & (b)(1)
) Transportation of Child Pornography
)
) Count 3: 18 U.S.C. § 2252(a)(4)(B) & (b)(2)
) Possession of Child Pornography
)
) Count 4: 18 U.S.C. § 2260A
) Offense by a Registered Sex Offender
)
) Forfeiture Notice



INDICTMENT

May 2022 Term—at Alexandria, Virginia

COUNT ONE
(Sexual Exploitation of Children)

THE GRAND JURY CHARGES THAT:

Between on or about at least December 11, 2018 and on or about April 8, 2019, in Fredericksburg, Virginia, within the Eastern District of Virginia, and elsewhere, the Defendant, CHAD MICHAEL LEHOFFER, attempted to and did employ, use, persuade, induce, entice, and coerce a minor, MINOR VICTIM 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and LEHOFFER knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and that visual depiction was produced and transmitted using materials that had been mailed,

shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction had actually been transported and transmitted using any means and facility of interstate commerce and in and affecting interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 2251(a) and (e).)

COUNT TWO
(Transportation of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 20, 2020 and on or about June 17, 2020, in Fredericksburg, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, CHAD MICHAEL LEHOFER, attempted to and did knowingly transport and knowingly and willfully cause to be transported, using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, any visual depiction, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct; to wit: video and image files depicting minor children engaging in sexually explicit conduct, including, but not limited to, actual and simulated masturbation, and the lascivious exhibition of the genitals and pubic area of any person.

(In violation of Title 18, U.S. Code, Sections 2252(a)(1), (b)(1), and 2(b).)

COUNT THREE
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2020, in Fredericksburg, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, CHAD MICHAEL LEHOFER, knowingly possessed and attempted to possess at least one matter containing one or more visual depictions that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which visual depictions were produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: videos and images, depicting prepubescent minors and minors who had not attained 12 years of age engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2252(a)(4)(B) & (b)(2).)

COUNT FOUR
(Penalties for Registered Sex Offenders)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about at least December 11, 2018 and on or about April 8, 2019, in Fredericksburg, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, CHAD MICHAEL LEHOFER, being required by Federal and other law to register as a sex offender, committed felony offenses involving a minor charged in Count One of this Indictment.

(In violation of Title 18, United States Code, Section 2260A.)

PRIOR CONVICTION ALLEGATION

Pursuant to Title 18, United States Code, Sections 2251(e), 2252(b)(1), and 2252(b)(2), it is further alleged that prior to committing the offenses charged in this Indictment, the defendant was convicted on or about July 12, 2006 under the laws of the State of Connecticut relating to sexual abuse and abusive sexual conduct involving a minor, to wit: Conn. Gen. Stat. Ann. § 53-21(a)(2) in Case No. KNL-CR05-0283819-T.

FORFEITURE NOTICE

THE GRAND JURY HEREBY FINDS THAT:

The defendant, CHAD MICHAEL LEHOFER, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction on any of Counts 1 through 3 of the indictment, he shall forfeit to the United States: (1) any visual depiction described in 18 U.S.C. §§ 2251 or 2252 or any matters that contain any such visual depictions, which was produced, transported, mailed, shipped, or received in violation of Chapter 110; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or property traceable to such property, including an Apple iPhone (Serial Number C39Z31QQKPFT).

Pursuant to 21 U.S.C. § 853(p), the defendant shall forfeit substitute property, if, by any act or omission of the defendant's, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

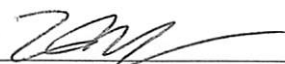
(In accordance with Title 18, United States Code, Section 2253(a); Title 21, United States Code 853(p); and Fed. R. Crim P. 32.2.)

A TRUE BILL:


FOREPERSON

JESSICA D. ABER
United States Attorney

By:



Zoe Bedell
Lauren Halper
Assistant United States Attorneys



Eduardo Palomo
Trial Attorney, Department of Justice
Child Exploitation and Obscenity Section

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office